

OBJECTIONS TO EX-U.S. AND HERNIA MESH DISCOVERY

Request for Production Responses

Supplemental Response to Request for Production No. 2

- Objects to documents related to hernia mesh products, which are subject to a meet and confer with the Plfs

Supplemental Response to Request for Production No. 11

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 15

- Objects to documents including those related to hernia mesh products. Engaging in a meet and confer with the Plfs

Supplemental Response to Request for Production No. 16

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Involved in a meet and confer process with Plfs

Supplemental Response to Request for Production No. 17

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities. Ethicon is involved in an ongoing meet and confer with Plfs on this issue.

Supplemental Response to Request for Production No. 21

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

Supplemental Response to Request for Production No. 22

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

Supplemental Response to Request for Production No. 23

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

Supplemental Response to Request for Production No. 24

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

Supplemental Response to Request for Production No. 25

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

Supplemental Response to Request for Production No. 26

- Objects to documents including those related to hernia mesh products
- "PROLIFT hernia mesh system" does not exist

Supplemental Response to Request for Production No. 28

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 29

- Objects to documents including those related to hernia mesh products
- Parties are currently involved in a meet and confer process concerning hernia mesh documents

Supplemental Response to Request for Production No. 47

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 48

- Objects to documents including those related to hernia mesh products
- Ethicon and Plfs continue to meet and confer concerning the scope of production concerning hernia mesh products

Supplemental Response to Request for Production No. 60

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Parties continue to meet and confer concerning the scope of production of documents located outside of the US

Supplemental Response to Request for Production No. 65

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States

- Parties continue to meet and confer concerning the scope of production of documents located outside the US

Supplemental Response to Request for Production No. 67

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 78

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 79

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 80

- Objects to documents including those related to hernia mesh products

Supplemental Response to Request for Production No. 82

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning this issue

Interrogatory Responses

Supplemental Response to Interrogatory 1

- Objects to interrogatory relating to foreign regulatory submissions
- Ethicon is currently working with Plfs to narrow and prioritize the scope of foreign regulatory production

Supplemental Response to Interrogatory 9

- Objects to interrogatory relating to foreign regulatory activities
- Ethicon is continuing to meet and confer with Plfs concerning foreign regulatory submissions

Supplemental Response to Interrogatory 22

- Objects to the production of information regarding hernia mesh

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